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Counsel for Defendant COFIELD

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON COFIELD,

Defendants.

Case No. CR 19-00100-VC

**DECLARATION OF COUNSEL IN
SUPPORT OF RAMON COFIELD'S
MOTION TO SUPPRESS**

I, GABRIELA BISCHOF, declare and state that:

1. I am an Assistant Federal Public Defender in the Northern District of California and I have been appointed to represent Ramon Cofield in the above-captioned case.
2. Attached hereto as Exhibit A is a true and correct copy of the National Center for Missing and Exploited Children's ("NCMEC") CyberTip Report No. 25390444, which I received from the government in discovery in this case.
3. Attached hereto as Exhibit B is a true and correct copy of the December 11, 2017, search warrant, warrant return, and probable cause statement to Tumblr, which I received from the government in discovery in this case.

4. Attached hereto as Exhibit C is a true and correct copy of the December 11, 2017, search warrant, warrant return, and probable cause statement to Google, which I received from the government in discovery in this case.
5. Attached hereto as Exhibit D is a true and correct copy of the December 21, 2017, search warrant and probable cause statement to AT&T, which I received from the government in discovery in this case.
6. Attached hereto as Exhibit E is a true and correct copy of the May 1, 2018, search warrant and probable cause statement for Mr. Cofield's person, vehicle, and residence, which I received from the government in discovery in this case.
7. Based on conversations with Pretrial Services and Mr. Cofield, and review of Mr. Cofield's medical records, I learned that Mr. Cofield suffers from congestive heart failure and diabetes, among other health conditions. He has been largely sheltering in place since the beginning of the pandemic and after 18 months of compliance with his conditions of release, in combination with his declining health, his bond was modified to eliminate the electronic monitoring condition. I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 30, 2020, in Berkeley, California.

/s/
GABRIELA BISCHOF